

2009 SBO/SBEAP NSC Technical Subcommittee

**September 22, 2009
11:30 PM Eastern**

**Conference Call:
866-299-3188
Access Code:
202-566-2827 #**

Minutes

Roll Call, by region: I-Sara (NH); III-Terry (WV), Susan (PA); IV- James (SC); V-Renee (WI), Erin (IL), Mark (IN), Rick, Todd (OH), Kim (MN); VII-Dan (IA), Lucy (MO); VIII – Joni (CO). Other: Audrey (AGZ)

Subcommittee leadership: Welcome new leadership Dan Nickey, Chair (IA) and Barb Johnson, Vice-Chair (MO). Dan thanked Renee Lesjak-Basel for her effective and valuable leadership of the TSC over the last several years.

Rule Updates: No new area source rules proposed. The subcommittee completed comments for all proposed rules of interest. The last batches of these rules are scheduled to be published final by October 16, November 16, and December 16.

Upcoming Rules: The only remaining rules of interest to the TSC are those for institutional/commercial boilers and brick/structural clay products, scheduled final Dec 2010.

Regional/State updates: Dan asked states to comment on their outreach for area source NESHAPs and state delgation status.

Region I: NH is conductiing auto body surveys and workshops; NESHAP priorities defined by the air division.

Region III: WV completed auto body workshops in cooperation with trade association; DEP seeking delgation for some NESHAPS. PA assisting with internal staff understanding of NESHAP rules and applicability; DEP seeking delegation of only 12 rules.

Region IV: SC partnered with air division and coating suppliers (PPG, Sherwin-Williams) for autobody workshops, developing autobody registration permit; DEC seeking full delegation. Most other Region IV states taking delegation, but not GA.

Region V: WI coordinating SIG-funded Region 5 autobody ERP; DNR not seeking delegation. IL autoboy EPR, outreach done for initial noticiations for 6C, 6H (others??), future outreach with Chicago area agencies for 6C; IL EPA seeking full delegation. MN autobody ERP; PCA not seeking delgation. IN autobody ERP, upcoming October DfE autobody workshops in Ft. Wayne for P2/6H best practices; DEM not seeking delegation. OH autobody ERP, upcoming GDF webinar (may include 6C), newsletter articles, proposed loan program for controls at area NESHAP facilities; Ohio EPA not seeking delegation.

Region VII: IA upcoming 14 autobody workshops in Oct.-Nov., Compliance calendars for bulk terminals 6B, and dry cleaners, working on fact sheets for 6X, 6W, and 6H; DNR seeking delegation.

Region VIII: CO conducted train-the-trainer events with suppliers for 6H compliance, developed self certifications for auto body and dry cleaners, working on fact sheet for 6B; DEP seeking partial delegation.

Open discussion:

1. Problems with 6X applicability per facility SIC/NAICS - could have different applicability determinations by Region.
2. 6H issues: 1) CO reported body shops commonly use 1-2 gallons of "airplane stripper" that contains methylene chloride and subjects shops to paint stripper portions of 6H. Shops may be reluctant to use substitutes and/or abrasive removal. 2) What is USEPA definition of "booth" and any overlap/conflicts with OSHA/ NFPA codes? Discussion ensued about use of curtains, solid walls, 3 or 4-sided enclosures.
3. Greenhouse Gas Reporting Rule was finalized today, see U.S. EPA web site. New subcommittee investigating small business impact. Contact Terry Polen for details and next call on October 14.
4. Future areas for TSC focus: with lull in NESHAP rule proposals, recommendations were made to focus on area source guidance and implementation issues

Next TSC call: Tuesday, October 27, 2009 11:30 EST.